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VIA ECF

Honorable Loretta A. Preska
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: *Giuffre v. Dershowitz*, Case No.: 19-cv-03377-LAP

Dear Judge Preska:

Pursuant to Rule 1.A of Your Honor's Individual Practices, Defendant Alan Dershowitz ("Professor Dershowitz") respectfully requests leave to file under seal a pre-motion conference letter seeking permission to file a motion for summary judgment with respect to Count II of Plaintiff Virginia Giuffre's Amended Complaint (ECF No. 117), as that Count is barred by a release executed by Plaintiff. As grounds therefore, Professor Dershowitz states that the letter references and attaches discovery material, e.g., Plaintiff's settlement agreement with Jeffrey Epstein, which she has designated confidential under protective orders entered in this action. Professor Dershowitz makes this request without prejudice to his right to later challenge the propriety of some or all of Plaintiff's confidentiality designations.

Respectfully submitted,

/s/ Howard M. Cooper
Howard M. Cooper

cc: Counsel of record

The sealing request is granted. SO ORDERED.

Loretta A. Preska 8/6/2021